

## LOG OF MEETING

### DIRECTORATE FOR ENGINEERING SCIENCES

~~NO PRESENTATION~~ 10/31/05  
~~PRODUCT IDENTIFIED~~  
~~ACCEPTED BY: PETITION~~  
~~RULING/ADMIN. PROC.~~  
~~WITH PORTIONS REMOVED:~~

**SUBJECT:** Discussion of issues associated with the possible revocation/amendment of 16 CFR Part 1632, the *Standard for the Flammability of Mattresses and Mattress Pads*

**DATE OF MEETING:** October 20, 2005

**SOURCE OF LOG ENTRY:** Patricia K. Adair, ESFS 

**LOCATION:** Room 410, CPSC Headquarters, Bethesda, MD

**CPSC ATTENDEES:** See attached list of attendees.

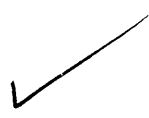
**NON-CPSC ATTENDEES:** See attached list of attendees.

**SUMMARY OF MEETING:** Al Klancnik (Serta), representing the International Sleep Products Association (ISPA) and the Sleep Products Safety Council (SPSC) members, identified issues/challenges associated with compliance with two mattress flammability regulations; one for flaming ignition (proposed 1633) and one for smoldering ignition (16 CFR Part 1632). Manufacturers recognize that there is not sufficient data to support revocation of 1632 at this time and encourage CPSC to conduct scientific research examining actual mattress fires started by different ignition sources. ISPA suggested that CPSC consider changes to 1632 in order to improve testing efficiencies and reduce testing burden. Specifically:

1. Extending the prototype pooling concept proposed in proposed 1633 to 1632. Allow prototype testing under both tests to be done on a pooled basis, thereby reducing testing and materials costs to manufacturers.
2. Integrating, where possible, the testing, documentation and quality control requirements of 1633 and 1632.
3. Modifying the 1632 test procedure and pass/fail criteria to make the test results more consistent and objective.
  - Specify a consistent and reliable alternative heat source
  - Develop more objective pass/fail criteria
  - Consider testing a different number of surfaces (less than 6) or a mattress subassembly in lieu of full scale testing for 1632

Mattress manufacturers are finding that TB-603 compliant mattresses also pass 1632. They have not found any barriers that smolder.

Compliance Director Gib Mullan noted that the majority of non-compliance with 1632 is with the recordkeeping requirements; performance is generally good. He expressed



interest in developing an interim compliance program in order to minimize the testing burden for compliance to both standards. Manufacturers were receptive to moving in this direction to find a short-term solution; Mike Murray (Sealy) will submit a written proposal in November on ways to integrate compliance requirements of 1633 and 1632.

Robert Polk (NASFM) commented that the discussion to amend rather than revoke 1632 was encouraging; the protective qualities of both standards are valuable and there is insufficient information to support revoking 1632. He cautioned against putting too much emphasis on low ignition propensity cigarettes (sometimes referred to as “self-extinguishing”) at this time since federal legislation mandating this product is probably a long way off.

ISPA/SPSC is planning to work with NIST on a research project to determine if 1632 is needed when 1633 becomes effective. In addition, ISPA and SPSC are planning a research project with NIST to develop a predictive small scale test for 1632. ISPA/SPSC will keep CPSC staff updated and involved as this work goes forward.

## ATTENDANCE

Issues associated with the possible revocation/amendment of 16 CFR 1632, the  
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October 20, 2005

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